



October 18, 2021

Document Electronically Filed
Honorable Katharine H. Parker
United States Magistrate Judge
U.S. District Court for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.

10/18/2021

Re: Wells v. Commissioner of Social Security
Civil Action No: 1:20-cv-06160-KHP

Dear Judge Parker:

This letter respectfully requests an extension of time of thirty (30) days for Plaintiff to file her motion for Judgment on the Pleadings in this matter. Plaintiff's portion of the Joint Stipulation is currently due on October 25, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her portion of the Joint Stipulation. Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's portion of the Joint Stipulation, and Plaintiff does not foresee the need for any further extensions of time regarding Plaintiff's portion of the Joint Stipulation.

If this request is granted, Plaintiff's portion of the Joint Stipulation will be due on **November 24, 2021**. Subsequently, in accordance with the pattern of the Standing Order at Dkt. No. 18, the Commissioner's portion of the Joint Stipulation would then be due on or before **December 27, 2021**. Plaintiff's reply, if any, will be due on or before **January 10, 2022**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky
Howard D. Olinsky, Esq.
Bar Code H06529
Counsel for Plaintiff

CC [via ECF]: Susan C. Brannigan, Esq. (Counsel for Defendant)

SO ORDERED.

Dated: _____
New York, NY

Honorable Katharine H. Parker
U.S. Magistrate Judge